

1

2

3

4

5

6

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

AT SEATTLE

7

8

PAULA R. MOOREHEAD,

9

Plaintiff,

10

NO. C05-17672

11

v.

SPECIAL VERDICT

12

13

MICHAEL CHERTOFF, Secretary,
U.S. Department of Homeland
Security, Transportation

14 Security Administration,

15

Defendant.

16

17

We, the jury, answer the questions submitted by the Court as
18 follows:

19

20

QUESTION NO. 1: Do you find that plaintiff is entitled to
recover on claim one?

21

22

ANSWER: NO (Write "yes" or "no")

23

24

(If the answer to Question No. 1 is "yes," proceed to Question
No. 5. If the answer to Question No. 1 is "no," proceed to
Question No. 2.)

25

26

1 QUESTION NO. 2: Do you find that plaintiff is entitled to
2 recover on claim two?

3 ANSWER: NO (Write "yes" or "no")

4 (IF the answer to Question No. 2 is "no," do not answer any
5 further questions and sign and date the Special Verdict. If the
6 answer to Question No. 2 is "yes," proceed to Question No. 3.)

7 QUESTION NO. 3: Has the defendant proved by a preponderance of
8 the evidence that the defendant's decision to remove plaintiff was
9 also motivated by a lawful reason?

10 ANSWER: _____ (Write "yes" or "no")

11 (IF your answer to Question No. 3 is "no," proceed to Question
12 No. 5. If your answer to Question No. 3 is "yes," proceed to
13 Question No. 4.)

14 QUESTION NO. 4. Has the defendant proved, by a preponderance
15 of the evidence, that the defendant would have made the same
16 decision to remove plaintiff even if the plaintiff's sex had played
17 no role in the defendant's decision?

18 ANSWER: _____ (Write "yes" or "no")

19 (IF your answer to Question No. 4 is "yes," do not answer any
20 further questions. If your answer to Question No. 4 is "no,"
21 proceed to Question No. 5.)

22 QUESTION NO. 5. What amount of damages do you award to
23 plaintiff?

24 ANSWER: \$ _____.

25

DATED this 18 day of April, 2007.

1 Elly M. Stewart
2 PRESIDING JUROR
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26